



**JEFFREY M. NELSON**  
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August 12, 2019

**VIA ELECTRONIC FILING**

Jocelyn G. Boyd, Esquire  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Re: **Docket Nos. 2018-321-E and 322-E**

Dear Ms. Boyd:

The South Carolina Office of Regulatory Staff (“ORS”) files this letter in response to Duke Energy Carolinas (“DEC”) and Duke Energy Progress (“DEP”) (collectively, “Companies”) letter filed on August 8, 2019. ORS agrees that constructive conversations between the Companies and ORS resulted in (1) an agreement by the Companies to withdraw from Commission consideration the request for a predetermination by the Commission permitting recovery of carrying costs on the ET Pilot programs implementation costs; and (2) an agreement by the ORS to withdraw its request for customer notice and hearing.

Other issues remain unresolved and are reserved for the Commission to consider the impacts to customers including:

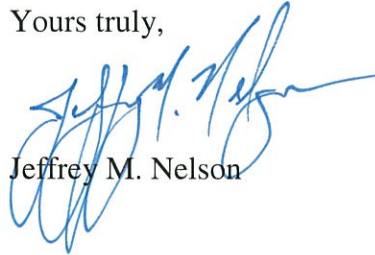
- (1) Request for an Accounting Order to defer capital costs and operating expenses related to the ET Pilot;
- (2) Residential EV Charging Program;
- (3) EV School Bus Charging Station Program;
- (4) EV Transit Bus Charging Station Program; and
- (5) DC Fast Charging Station (“DCFC”) Program

ORS reiterates its comments filed on May 20 and July 9, 2019 regarding the lack of a sufficient cost-benefit analysis and objection to the Companies request for an accounting order. ORS recommended shifting funding from rebates on EV school buses to make-ready and charging

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infrastructure. ORS also recommended against expansion of the DCFC program beyond that originally proposed by DEC and DEP without further cost-benefit analysis.

Yours truly,



Jeffrey M. Nelson

cc: Joseph Melchers, Esquire (via E-mail)  
All Parties of Record (via E-mail)